

## Annual 47 C.F.R. § 64.2009(e) CPNI Certification

### EB Docket 06-36

Annual 64.2009(e) CPNI Certification for 2012 covering the prior calendar year 2011.

1. Date filed: March 1, 2012
2. Name of company(s) covered by this certification: Twilio Inc.
3. Form 499 Filer ID: 828513
4. Name of signatory: EVAN COOKE
5. Title of signatory: CTO
6. Certification:

I, Evan Cooke, certify that I am an officer of the company named above, and acting as an agent of the company, that I have personal knowledge that the company has established operating procedures that are adequate to ensure compliance with the Commission's CPNI rules. *See 47 C.F.R. § 64.2001 et seq.*

Twilio's service is a non-interconnected Voice over Internet Protocol (VoIP) product. Further, Twilio utilizes telecommunications in the provision of its service, but does not provide a "telecommunications service" under the terms of the Communications Act of 1934 as amended. However, Twilio is filing this certificate out of an abundance of caution.

Attached to this certification is an accompanying statement explaining how the company's procedures ensure that the company is in compliance with the requirements (including those mandating the adoption of CPNI procedures, training, recordkeeping, and supervisory review) set forth in section 64.2001 *et seq.* of the Commission's rules.

The company has not taken actions (i.e., proceedings instituted or petitions filed by a company at either state commissions, the court system, or at the Commission against data brokers) against data brokers in the past year.

The company has not received customer complaints in the past year concerning the unauthorized release of CPNI.

The company represents and warrants that the above certification is consistent with 47 C.F.R. § 1.17 which requires truthful and accurate statements to the Commission. The company also acknowledges that false statements and misrepresentations to the Commission are punishable under Title 18 of the U.S. Code and may subject it to enforcement action.

Signed: 

Date: 03/01/2012

Attachment: Accompanying Statement Explaining CPNI Procedures

**Twilio Inc.**  
**Statement Regarding Customer Proprietary Network Information Operating Procedures**

Twilio Inc. ("Twilio") in accordance with Section 64.2009(e), submits this statement summarizing how the Twilio's operating procedures are designed to ensure compliance with the Commission's CPNI rules. Twilio provides non-interconnected Voice over Internet Protocol (VoIP) service. Twilio utilizes telecommunications in the provision of its service, but is not a "telecommunications carrier" as defined by the Communications Act of 1934, as amended<sup>1</sup>, nor does it provide interconnected VoIP, as defined by the Commission<sup>2</sup>. This statement summarizes the procedures that Twilio has implemented to safeguard the CPNI of its customers. Therefore, Twilio is not required to file this Statement Regarding Customer Proprietary Network Information Operating Procedures or the associated CPNI Certificate, however is doing so out of an abundance of caution.

Twilio values its customers' privacy and takes measures to protect CPNI. It is Twilio's policy to protect the confidentiality of its customers' information. Twilio does not use, disclose or permit access to its customers' CPNI except as such use, disclosure or access is permitted under Section 222 of the Communications Act of 1934, as amended, and the Commissions implementing rules.

As necessary, Twilio may use CPNI for the permissible purposes enumerated in the Act and the Commission's rules, including, but not limited to, initiating, rendering, billing and collecting for its non-interconnected VoIP services. Twilio may also use CPNI to protect its rights or property.

Twilio has in place a process for verifying its customers' identity during an inbound call. Except for business customers who have specifically authorized release of CPNI pursuant to a procedure established by contract, Twilio does not release call detail information during an inbound call.

Twilio trains its personnel in the use of CPNI. Twilio has an express disciplinary process in place for violations of Twilio's CPNI policies. Twilio employees are required to sign a non-disclosure agreement which requires them to protect all confidential information.

Twilio does not use CPNI to market products or services to customers outside of the category of service to which the customer already subscribes. Twilio allows its customers to opt-in to receive marketing materials from Twilio affiliates. Twilio does not share CPNI with third parties for marketing purposes. If, in the future, Twilio seeks to use CPNI for these purposes, it will provide the appropriate notice to its customers and will maintain a list of customer preferences. Twilio also will maintain a record of any marketing campaign in accordance with the Commission's rules.

Twilio takes reasonable measures to discover and protect against attempts to gain unauthorized access to CPNI. Twilio has practices and procedures in place to notify law enforcement, and customers, if permitted, of a security breach which results in the unauthorized access to, use or disclosure CPNI. Twilio will maintain a record of the notification in accordance with the Commission's rules. Twilio also maintains agreements with credit card companies with

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<sup>1</sup> 47 U.S.C. §153(44)

<sup>2</sup> 47 CFR § 9.3

their own strict, privacy-protection requirements.